

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

MICHAEL MOATES, DC CHRONICLE,  
and DC CHRONICLE LIMITED,

Plaintiffs,

v.

FACEBOOK, INC. AND AT&T INC.,

Defendants.

Case No. 4:21-cv-00694

**MOTION FOR ENTRY OF STIPULATION  
REGARDING DEADLINES RELATED TO REMOVAL AND REMAND**

Plaintiffs Michael Moates, DC Chronicle and DC Chronicle Limited (“Plaintiffs”), and Defendant Facebook, Inc. (“Defendant”), by and through their undersigned counsel, request the Court to enter the stipulation attached as Exhibit A.

Dated: September 9, 2021

Respectfully submitted,

By: /s/ Allison Jacobsen

Allison Jacobsen

Texas Bar No. 00783549

HUNTON ANDREWS KURTH LLP

1445 Ross Avenue, Suite 3700

Dallas, TX 75202

Telephone: 214.979.3000

Facsimile: 214.880.0011

[ajacobsen@huntonak.com](mailto:ajacobsen@huntonak.com)

Attorney for Defendant FACEBOOK, INC.

By: /s/ Michael Moates

Michael Moates, *pro se*

2700 Colorado Blvd., No. 1526

Denton, TX 76201

*Pro se Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 9<sup>th</sup> day of September, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send electronic notification of the same to all counsel of record. I further certify that I have served Plaintiffs via e-mail at [michaelsmoates@gmail.com](mailto:michaelsmoates@gmail.com).

By: /s/ Allison Jacobsen